UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

August 30, 2010

REPLY TO THE ATTENTION OF:

Mr. Jerry C. Winslow
Principal Environmental Engineer
Xcel Energy
414 Nicollet Mall (Ren. Sq. 8)
Minneapolis, Minnesota 55401

SR-6J

RE: Response to Additional Comments on EPA's Proposed Plan
Ashland/NSP Lakefront Superfund Site

Dear Mr. Winslow:

In April 2010, Northern States Power Company, a Wisconsin corporation, d/b/a Xcel Energy (NSPW) submitted additional comments to the United States Environmental Protection Agency's (EPA) Proposed Plan, dated June 2009. The comment period for the Proposed Plan ended on August 17, 2009. However, EPA has reviewed the additional comments and our response is provided below. The NSPW comment letter and EPA's response will be included in the Administrative Record (AR).

1. Comment #1: TPAH performance standards should apply to the habitat restoration layer on a Surface Weighted Average Concentration (SWAC) basis, not at the dredge "cut line".

Response: The requirement to meet 9.5 ppm tPAH on a SWAC basis will be applied at the generated residuals layer (cut line) and after the six inch cover layer (lakebed stabilization layer). EPA believes the 9.5 ppm requirement at the cut line is necessary in order to protect human health and the environment. As described above, after dredging is completed, six inches of clean fill would be placed on areas that are dredged for purposes of providing lakebed stabilization. A side benefit is that it could also provide a better habitat for recruitment of benthic macroinvertebrates and for spawning of fish (habitat restoration layer).

The overall goal of the sediment cleanup is to achieve the SWAC cleanup goal following excavation/dredging, prior to the placement of the lakebed stabilization layer. (The SWAC is then to be reconfirmed following placement of the lakebed stabilization layer.) However, in the event that the SWAC cleanup goal cannot be met prior to placement of the lakebed stabilization layer, despite the utilization of best efforts and best available excavation and dredging technologies and techniques (as determined by EPA and WDNR), the Agencies may decide to allow use of the lakebed stabilization layer as a sediment residual cover to assist in meeting the SWAC.

2. Comment #2: The establishment of a "maximum" single sample cleanup goal is neither necessary nor practicable.

EPA believes the 22 ppm "maximum" requirement is necessary in order to protect human health and the environment. In addition, the Wisconsin Department of Natural Resources (WDNR) Probable Effects Concentration (PEC) is 22 ppm. The 22 ppm is further supported by the iterative ecological risk assessment data collected during the life of the project as shown in the attached Figure 1.

The 22 ppm maximum is consistent with, and in some cases less stringent than, the standard established at similar sites. For example, the Newton Creek and Hog Island Inlet sediment remediation project under the Great Lakes Legacy Act. The Hog Island Inlet was segregated into units composed of a 100-foot by 100-foot grid, for effective excavation of the sediment and for statistically verifiable sample collection. The decision statement for the Inlet specified that additional excavation of a unit within the Inlet would be warranted:

- **if the average concentration of TPAH in any of the 100x100 foot units was greater than or equal to 2.6 mg/kg (ppm);**
- **if a single result was greater than 7.5 mg/kg; or**
- **if a single result was greater than 5 mg/kg, then additional excavation *may* be warranted based on observed concentrations in surrounding units and available data from pre-remediation assessments.**

3. Comment #3: The presence of sheens/globules should trigger appropriate control measures not re-dredging.

Response: One of the Remedial Action Objectives (RAOs) for sediment , as described in the final RI/FS, is to conduct NAPL (source) removal whenever it is necessary to halt or contain the discharge of a hazardous substance or to minimize the harmful effects of the discharge to the air, land or water. Since a sheen/globule is considered a NAPL, then it must be removed either by re-dredging or any other control measure that will help meet the objective of NAPL removal.

4. Comment #4: A pilot project should be used to optimize the full scale wet dredge remedy, and performance standards need to be selected that are practical and implementable.

Response: A pre-design pilot test will need to be conducted to determine whether wet dredging for the sediments will meet performance standards and can be conducted in a manner protective of human health and the environment. If the pilot test results show that wet dredging can meet the established standards and EPA, in consultation with WDNR, recommends wet dredging as the sediment remedy, then the site-specific operations data from the pilot project will be used to help optimize a future, full-scale wet dredge remedy.

If you have any questions, please contact me at (312) 886-1999.

Sincerely,

Scott K. Hansen
Remedial Project Manager

cc: Jamie Dunn, WDNR
Omprakash Patel, Weston Solutions, Inc.